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Attorney for Defendant  
MARIA LUISA ESCAMILLA LOPEZ

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JOSE ENCARNACION MAYO RODRIGUEZ,  
SYLVIA ZAMBRANO, MARIA LUISA  
ESCAMILLA LOPEZ, JUAN CHAVARRIA,  
JUAN RAMON LOPEZ, NEREYDA  
ALVAREZ, and CHARLES JAMES  
BILLINGSLEY,  
Defendants.

Case No.: 2:19-cr-231 WBS

STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE  
AND EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT

Date: March 20, 2023  
Time: 9:00 a.m.  
Court: Hon. William B. Shubb

This is a case charging conspiracy to distribute methamphetamine and heroin. It is presently set for status conference on December 5, 2022. The government has provided to defense counsel voluminous discovery consisting of approximately 4,400 pages of material,

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1 including numerous video and audio recordings, photographs, and written investigative reports.

2 Many of the events at issue in the case occurred in San Joaquin County, with additional  
3 matters occurring in Southern California and the San Francisco Bay Area. Defense investigation  
4 into the charged events can be characterized as state-wide in scope. The global pandemic has  
5 hampered or delayed some defense investigation efforts. This investigation is a prerequisite to  
6 anticipated negotiated disposition as to several of the remaining defendants in this case.  
7

8 The parties to this action, Plaintiff United States of America by and through Assistant  
9 United States David Spencer, and Attorney Todd Leras on behalf of Defendant Jose Mayo  
10 Rodriguez, Attorney Christopher Cosca on behalf of Defendant Sylvia Zambrano, Attorney Dina  
11 Santos on behalf of Defendant Maria Escamilla Lopez, Attorney Clemente Jimenez on behalf of  
12 Defendant Juan Chavarria, Attorney Philip Cozens on behalf of Defendant Juan Lopez, Attorney  
13 Betty Williams on behalf of Defendant Nereyda Alvarez, and Attorney Johnny L. Griffin, III, on  
14 behalf of Defendant Charles Billingsley, stipulate as follows:  
15

- 16
- 17 1. By this stipulation, Defendants now move to vacate the status conference presently  
18 set for December 5, 2022. The parties request to continue the status conference to  
19 March 20, 2023, at 9:00 a.m., and to exclude time between December 5, 2022 and  
20 March 20, 2023, inclusive, under Local Code T-4. The United States does not oppose  
21 this request.  
22
  - 23 2. Based on the above-stated facts regarding the volume of discovery and the time  
24 required for defense investigation, the parties jointly request that the Court find that  
25 the ends of justice served by continuing the case as requested outweigh the best  
26 interest of the public and the Defendants in a trial within the time prescribed by the  
27

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Speedy Trial Act.

3. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of December 5, 2022 to March 20, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court at Defendants' request on the basis that the ends of justice served by taking such action outweigh the best interest of the public and the Defendants in a speedy trial.
4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Assistant U.S. Attorney David Spencer and all defense counsel have reviewed this proposed order and authorized Dina Santos to sign it via email on their behalf.

DATED: November 28, 2022

By /s/ Dina Santos for  
DAVID SPENCER  
Assistant United States Attorney

DATED: November 28, 2022

By /s/ Dina Santos  
TODD D. LERAS  
Attorney for Defendant  
JOSE MAYO RODRIGUEZ

DATED: November 28, 2022

By /s/ Dina Santos for  
CHRISTOPHER R. COSCA  
Attorney for Defendant  
SYLVIA ZAMBRANO

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DATED: November 28, 2022

By /s/ Dina Santos  
DINA L. SANTOS  
Attorney for Defendant  
MARIA ESCAMILLA LOPEZ

DATED: November 28, 2022

By /s/ Dina Santos for  
CLEMENTE JIMENEZ  
Attorney for Defendant  
JUAN CHAVARRIA

DATED: November 28, 2022

By /s/ Dina Santos for  
PHILIP COZENS  
Attorney for Defendant  
JUAN RAMON LOPEZ

DATED: November 28, 2022

By /s/ Dina Santos for  
BETTY WILLIAMS  
Attorney for Defendant  
NEREYDA ALVAREZ

DATED: November 28, 2022

By /s/ Todd D. Leras for  
JOHNNY L. GRIFFIN, III  
Attorney for Defendant  
CHARLES BILLINGSLEY


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**ORDER**

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for December 5, 2022, is vacated. A new status conference is scheduled for March 20, 2023, at 9:00 a.m. The Court further finds, based on the representations of the parties and Defendants' request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendants in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from December 5, 2022, up to and including March 20, 2023.

IT IS SO ORDERED.

Dated: November 30, 2022

  
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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

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